

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**MAKE THE ROAD STATES, INC.,
NAACP BUCKS COUNTY BRANCH
2253, BUXMONT UNITARIAN
UNIVERSALIST FELLOWSHIP,
and JUAN NAVIA,**

Plaintiffs,

v.

**FREDERICK A. HARRAN,
individually and in his official
capacity as Sheriff of Bucks County,
and BUCKS COUNTY,**

Defendants.

No. 2:25-cv-02938

**DECLARATION OF ARIEL SHAPELL
IN SUPPORT OF PETITION FOR AWARD OF ATTORNEY'S FEES**

I, Ariel Shapell, am one of the attorneys of record for the plaintiffs in the above-captioned case. I make the following declaration upon my personal knowledge:

1. This declaration is submitted in support of Plaintiffs' Petition for Attorneys' Fees.
2. I am a Staff Attorney of the ACLU of Pennsylvania, where I have worked as an attorney since September 2021.
3. I graduated from the University of Pennsylvania Carey Law School in 2021 and earned my undergraduate degree from Washington University in St. Louis.
4. I certify that the attached time sheets, which are incorporated by reference, were prepared contemporaneously and maintained in the ordinary course of business.
5. The hours we have billed in this case are fair and reasonable and were necessarily incurred in the successful prosecution of this case.

6. Only the time spent on this case that could reasonably be billed to a private client has been included.
7. Based on my experience and standing in the bar, I believe that the requested rate of \$315 per hour is fair and reflects the prevailing community rate for civil rights lawyers of comparable skill and experience.
8. I am currently admitted to practice in Pennsylvania and in the United States District Courts for the Eastern and Western Districts of Pennsylvania.
9. I am a salaried employee of the ACLU of Pennsylvania, a nonprofit, nonpartisan organization dedicated to defending and protecting our individual rights and personal freedoms. We do not charge our clients, and have not done so in this case.

Consequently, I am subject to the “community market rate rule” for determining my fee rate.
10. My hourly rate of \$315 per hour reflects the community market rate for attorneys of comparable skill and experience. This rate is based on knowledge of rates charged by legal nonprofits in Philadelphia with similar levels of experience and educational backgrounds.
11. My total billable hours for the U.S. District Court proceedings in this case are 4.45. The total amount (lodestar), as calculated by multiplying the hours times the prevailing billing rate of \$315, is \$1,401.75.
12. For the foregoing reasons, I believe that my requested hourly rate of \$315 is fair, reasonable, and well within the scope of rates given to federal court litigators with similar experience, skill, and standing in the Philadelphia legal community.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 1, 2025

Respectfully submitted,

By: /s/ Ariel Shapell

Ariel Shapell (No. 330409)
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***Make the Road v. Harran* – Ariel Shapell Attorney Time - E.D. Pa.**
Hourly Rate = \$315

Date	Description	Time	Amount
06/09/2025	Performing legal research on Defendant Harran's failure to seek consent for removal from Defendant Bucks County.	0.5	\$ 157.50
06/11/2025	Reviewing and revising remand briefing.	0.3	\$ 94.50
06/11/2025	Legal Team Discussion re: Remand Motion strategy	0.3	94.50
06/16/2025	Preparing for and participating in status conference on remand motion.	0.6	\$ 189.00
06/18/2025	Discussing status of remand motion with clients.	0.5	\$ 157.50
06/24/2025	Reviewing and revising remand reply brief.	2.4	\$ 756.00
TOTAL		4.6	\$1,449.00